

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE

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**In re** : **Chapter 11**  
**TERRAFORM LABS PTE. LTD.,** : **Case No. 24-10070 (BLS)**  
**Debtor.<sup>1</sup>** :  
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**NOTICE OF FILING OF REVISED PROPOSED ORDER  
PURSUANT TO BANKRUPTCY CODE SECTION 363 AUTHORIZING  
DEBTOR TO PAY CERTAIN AMOUNTS IN FURTHERANCE OF  
LITIGATION AND GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that, on February 14, 2024, Terraform Labs Pte. Ltd., as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), filed the *Motion of Debtor for Entry of Orders Pursuant to Sections 363, 503(b), and 105(a) of the Bankruptcy Code Authorizing Debtor to Pay Certain Amounts in Furtherance of Litigation and Granting Related Relief* [Docket No. 61] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached to the Motion as Exhibit A was a proposed form of order granting the relief sought therein (the “**Proposed Order**”).

PLEASE TAKE FURTHER NOTICE that the Debtor received objections to the relief requested in the Motion from the U.S. Securities and Exchange Commission [Docket No. 87], the Office of the United States Trustee for the District of Delaware [Docket No. 104], and the Official Committee of Unsecured Creditors [Docket No. 140], as supplemented by Docket No. 163 (the “**UCC Objection**”).

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<sup>1</sup> The Debtor’s principal office is located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

PLEASE TAKE FURTHER NOTICE that the Debtor hereby files a revised version of the Proposed Order (the “**Revised Order**”) resolving the UCC Objection. The Revised Order is attached hereto as **Exhibit 1**. For the convenience of the Court and all interested parties, attached hereto as **Exhibit 2** is a blackline comparing the Revised Order against the Proposed Order.

PLEASE TAKE FURTHER NOTICE that the Debtor intends to present the Revised Order at the hearing currently scheduled for **March 12, 2024 at 10:00 a.m. (ET)** (the “**Hearing**”) before The Honorable Brendan L. Shannon at the Court, 824 North Market Street, 6th Floor, Courtroom 1, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that to the extent that the Revised Order is further revised, the Debtor will present a blackline copy of such revised document to the Court either at or before the Hearing.

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Dated: March 11, 2024  
Wilmington, Delaware

*/s/ Matthew P. Milana*

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RICHARDS, LAYTON & FINGER, P.A.  
Paul N. Heath (No. 3704)  
Zachary I. Shapiro (No. 5103)  
Matthew P. Milana (No. 6681)  
One Rodney Square  
920 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 651-7700  
Email: heath@rlf.com  
shapiro@rlf.com  
milana@rlf.com

-and-

WEIL, GOTSHAL & MANGES LLP  
Ronit Berkovich (admitted *pro hac vice*)  
Jessica Liou (admitted *pro hac vice*)  
F. Gavin Andrews (admitted *pro hac vice*)  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Email: ronit.berkovich@weil.com  
jessica.liou@weil.com  
f.gavin.andrews@weil.com

*Attorneys for Debtor  
and Debtor in Possession*